The Productivity Commission (the Commission) have undertaken an inquiry into the role of improving mental health to support economic participation and enhancing productivity and economic growth. The Commission has released an issues paper to assist individuals and organisations to participate in the inquiry.

The Department is welcoming comments and feedback on any issues relevant to the inquiry’s terms of reference until the 5th April 2019.

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ABOUT SIOPA

The Psychology Board of Australia provides endorsement across nine (9) areas of expertise in psychology – Clinical Neuropsychology, Clinical Psychology, Community Psychology, Counselling Psychology, Educational and Developmental Psychology, Forensic Psychology, Health Psychology, Organisational Psychology, and Sport Psychology. SIOPA represents Organisational Psychologists and practitioners working in the expert field of Organisational Psychology.

Founded in November 2016, the Society for Industrial and Organisational Psychology Australia (SIOPA) is an independent and incorporated association with a purpose to create growth, supervision and professional development opportunities for Organisational Psychologists and related disciplines in Australia. Our practices, methods and principles have been derived and supported by US based SIOP and are tailored to suit the renewed challenges that present our profession moving into the future in Australia.

Organisational Psychologists are trained as “scientist-practitioners”. Organisational Psychologists evaluate and conduct research then apply knowledge of evidence to inform our practice. Evidence based practice is guided by the best quality, most current research findings in order to achieve the desired outcome in practical contexts. Among their many areas of practice, Organisational Psychologists may work in workplace rehabilitation, occupational health and safety, mental health and wellbeing, stress and work-life balance. Organisational Psychologists’ expertise and knowledge of individual, group and organisational factors allow them to more accurately identify the root cause of an issue, and thus develop an effective intervention. Therefore, it is appropriate for SIOPA to comment on matters raised in the issues paper.

FOCUS AND FORMAT OF SUBMISSION

SIOPA appreciates the opportunity to comment on The Social and Economic Benefits of Improving Mental Health issues paper. SIOPA’s submission to this inquiry will provide the unique viewpoint from Organisational Psychologist’s perspectives in terms of mentally healthy workplaces and the role of the employer. This submission will address some of the key sections raised with a focus on the prevention of work-related mental ill health. We will refer to the page number for the specific section we intend to address.
WHAT TYPES OF WORKPLACE INTERVENTIONS DO YOU RECOMMEND THIS INQUIRY EXPLORE AS OPTIONS TO FACILITATE MORE MENTALLY HEALTHY WORKPLACES? WHAT ARE SOME OF THE ADVANTAGES AND DISADVANTAGES OF THE INTERVENTIONS; HOW WOULD THESE BE DISTRIBUTED BETWEEN EMPLOYERS, WORKERS AND THE WIDER COMMUNITY; AND WHAT EVIDENCE EXISTS TO SUPPORT YOUR VIEWS?

SIOPA recognises that there are a number of workplace initiatives specifically targeted at building mentally healthy workplaces. For example, Mental Health Awareness training, resilience training mentoring, peer support programs and Employee Assistance Programs. SIOPA also recognises that the psychosocial risk factors and hazards that may occur within a workplace are not often solved or mitigated within one training session or through support alone. Training sessions and support are secondary and tertiary level interventions or individual-level focussed approaches which do not address the problem at its source.

Systems approaches, are the most effective in addressing mentally healthy workplaces¹. Systems approaches combine primary level interventions such as organisationally focused approaches, to improve psychosocial working conditions with individual-level focussed interventions to develop employees’ coping capacity². Despite the evidence that system approaches are the most effective to facilitate mentally healthy workplaces, organisations nationally and internationally disproportionately use individual-focussed approaches to facilitate mentally healthy workplaces. This trend requires arresting as research shows individual-level approaches are likely to only improve individual health outcomes and have little effect on reducing the source of the problem and organisational outcomes³.

Recent guidance from Australian work health and safety regulatory agencies advises organisations to adopt a risk management approach to creating and maintaining mentally healthy workplaces\(^5\). The Department of Mines, Industry Regulation and Safety in Western Australia has published a code of practice for WA employers on creating and maintaining mentally healthy workplaces. The Code of Practice emphasises a systems approach through a risk management approach towards creating and maintaining mentally healthy workplaces\(^6\). The Code of Practice outlines the most common psychosocial hazards and risk factors that employees may be exposed to and provide guidance on how to reduce the risk of harm to health to employees. The workplace psychosocial hazards include bullying, stress, violence and aggression, burnout and fatigue.

An example of an evidence-based system approach to addressing mentally healthy workplaces is work design. Work design affects distress, strain, and injury, as well as aspects of positive mental and physical health such as aspiration, self-efficacy, engagement and safe working\(^7\). ‘Good’ work design can incorporate a number of primary (e.g. reducing strain-inducing demands and increasing job resources, autonomy and purpose), secondary (e.g. stress-management training) and tertiary (e.g. counselling)\(^8\) strategies. As every workplace is different, approaches to work design need to be context specific in order to be effective\(^9\).

A systems approach is an evidenced based approach shown to create and maintain mentally healthy workplaces when used through a risk management process. SIOPA recommends the Productivity Commission emphasises this approach in their report.

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\(^9\) https://www.safeworkaustralia.gov.au/good-work-design
**How can workplace interventions be adapted to increase their likelihood of having a net benefit for small businesses?**

As mentioned above, a systems approach through a risk management approach will assist small businesses in experiencing the benefits of creating a mentally healthy workplace. A risk management approach considers factors such as the size of the business and workforce characteristics when determining appropriate and practicable interventions. Small businesses are likely to benefit from specific guidance and assistance such as education sessions or consultancy services. Organisations, such as Heads Up, are providing a number of resources and strategies for organisations to develop a mentally healthy workplace, including resources specific for small business.¹⁰

**What role do industry associations, professional groups, governments and other parties currently play in supporting small businesses and other employers to make their workplaces mentally healthy? What more should they do?**

The National Survey of Mental Health and Wellbeing¹¹ provides evidence on the prevalence of mental illness in the Australian population, disability associated with mental illness and the use of health services by people with mental health issues. The most recent survey results from 2007 are still widely referenced today to inform policy and in national training programs such as Mental Health First Aid Australia. Given the large cost associated with mental ill health in the workforce and wider community, SIOPA recommends that Government seek to fund the survey again to gather more relevant data to inform research, effective interventions and the allocation of resources.

As discussed above, small businesses may benefit from specific guidance and consultancy services to assist them in facilitating a mentally healthy workplace.

**What differences between sectors or industries should the Commission take account of in considering the scope for employers to make their workplaces more mentally healthy?**

Many work-related psychosocial hazards and risk factors are common across sectors and industries, which include (but are not limited to) work demands, little autonomy, inadequate support, lack of role clarity, poor change management, low reward and recognition, poor organisational justice, inappropriate behaviour and traumatic events. However, frequency of exposure and severity may differ across the sectors and industries which creates high-risk groups. For example, first responders such as defence force, emergency services (i.e. police, ambulance, fire), health, support and welfare, prison and security and automobile, bus and rail drivers are more likely to be exposed to trauma given the nature of their work and therefore are a high-risk group.¹²

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Employees who engage in fly-in, fly-out (FIFO), drive-in, drive-out (DIDO) and offshore work practices have also been identified as a high-risk group. Research conducted by Curtin University and the University of Western Australia, funded by the Mental Health Commission of Western Australia, have found that FIFO workers and their partners are an at-risk group for mental ill health. Psychosocial hazards and risk factors specific to this sector include (but are not limited to) extended work hours, rosters, accommodation, extreme environmental conditions, remote work, isolated work, fatigue and alcohol and other drug use.

SIOPA suggests that the Commission take into account the significant challenges and psychosocial hazards and risk factors that specific sectors and industries may face. Whilst a number of initiatives may be appropriate to making workplaces more mentally healthy in general, it is likely that high-risk industries may need further, more focused assistance. Therefore, SIOPA advocates a using risk management approach to facilitate mentally healthy workplaces.

**PAGE 31. REGULATION OF WORKPLACE HEALTH AND SAFETY**

**WHAT WORKPLACE CHARACTERISTICS INCREASE THE RISK OF MENTAL ILL-HEALTH AMONG EMPLOYEES, AND HOW SHOULD THESE RISKS BE ADDRESSED BY REGULATORS AND/OR EMPLOYERS?**

While individual factors contribute to the individual’s perception of their work environment, demands and coping capacity, focusing only on this aspect is not likely to modify the work environment. The work environment should be the primary focus of regulators and employers as research demonstrates that while individual-level focused approaches are important and should be included as part of an overall systems approach to facilitating mentally healthy workplaces, organisational level focused approaches are likely to have a larger impact on changes in health, wellbeing and productivity.

SIOPA agrees with the statement in the Issues Paper that, “... identifying, assessing and addressing risks to mental health in the workplace is likely to be more complex than for physical health because many of the risk factors ... are not as easily identified and addressed. While psychosocial hazards and risk factors will vary between industries, organisations and job roles, Safe Work Australia have identified the following as contributors to the risk of mental-ill health: job demands, job control, support, workplace relationships, role clarity, organisational change management, recognition and reward, organisational justice, environmental

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conditions, remote or isolated work and traumatic events\textsuperscript{15}. Nonetheless there is substantial evidenced based information and resources available at low to no cost to workplaces to identify psychosocial hazards and risk factors, and their associated interventions. For example, the UK Health Safety Executive Management Standards\textsuperscript{16}, the Copenhagen Occupational Psychosocial Questionnaire\textsuperscript{17} and People at Work tool\textsuperscript{18}. The Guide: Work-related Psychological Health and Safety\textsuperscript{19} provides a systematic approach to managing work-related psychological health and safety. Work Health and Safety QLD have published a comprehensive Mentally Healthy Workplaces Toolkit\textsuperscript{20}.

\textbf{END OF SUBMISSION}

\textsuperscript{15} https://www.safeworkaustralia.gov.au/topic/mental-health
\textsuperscript{16} http://www.hse.gov.uk/stress/standards/
\textsuperscript{17} https://www.copsoq-network.org/